

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT DEPARTMENT
MIDDLESEX DIVISION

NO: [REDACTED]

COMMONWEALTH

V. [REDACTED]

MOTION TO COMPEL PRODUCTION OF
DOCUMENTARY EVIDENCE AND OBJECTS
PURSUANT TO SUBPOENA DUCES TECUM

Now comes the defendant, [REDACTED] and moves before this Honorable Court, pursuant to M.R. Crim. P. 17 (a)(2), for an order compelling THE COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF PUBLIC HEALTH, WILLIAM A. HINTON STATE LABORATORY INSTITUTE, 350 SOUTH ST., JAMAICA PLAIN, MA., 02130 to produce documentary evidence and objects (specifically, records showing that State Chemist ANNIE DOOKHAN breached the chain of custody protocol of the William A. Hinton State Laboratory Institute in June, 2011, thus, affecting cases in Norfolk County) pursuant to subpoena duces tecum.

As reason, therefor, the defendant attaches an affidavit.

Respectfully submitted,

[REDACTED]
By his Attorney:

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Dated: July 2, 2012

